

Richard J. Reynolds, SBN 89911
Rafael R. Garcia-Salgado, SBN 283230
Burke, Williams & Sorensen, LLP
1851 E. First Street, Suite 1550
Santa Ana, CA 92705
Telephone: 949.863.3363
Facsimile: 213.236.2700

Attorneys for Secured Creditor Trojan Capital
Investments, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In Re
MICHAEL JOSEPH RUFFNER,

Debtor.

TROJAN CAPITAL INVESTMENTS,
LLC,

Moving Party,

v.
MICHAEL JOSEPH RUFFNER,

Respondent.

Case No. 8:17-bk-14421-ES

Chapter 7

**SUPPLEMENTAL DECLARATION OF
THANH VO IN SUPPORT OF TROJAN
CAPITAL INVESTMENTS, LLC'S
MOTION FOR RELIEF FROM STAY**

Continued Hearing on Motion:

Date: May 25, 2018

Time: 1:00 p.m.

Judge: Erithe Smith

Ctrm: 5A

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1 I, Thanh Vo, declare as follows:

2 1. The following facts are personally known to me, and I have first-hand knowledge
3 of the same, or are matters of which the Court may take judicial notice. If called as a witness, I
4 could and would competently testify thereto under oath. I am the Loss Mitigation Manager of
5 Movant TROJAN CAPITAL INVESTMENTS, LLC ("**Trojan**") and I am authorized to make
6 this Declaration. This Declaration is provided in support of Trojan's Motion for Relief from Stay
7 (**the "Motion"**), filed in the above-captioned case on November 28, 2017.

8 2. Trojan is the holder of the Note between Michael Joseph Ruffner, as borrower (the
9 "Debtor"), and National City Bank, as the original lender, dated September 22, 2006 (**the**
10 "**Note**"), having purchased it. Trojan has physical possession of the original Note, which has
11 been endorsed to Trojan. A true and correct copy of the Note together with the endorsements
12 thereon is attached to the Motion as Exhibit "2" and incorporated herein by reference.

13 3. Pursuant to the Court's order at the May 21, 2018 evidentiary hearing on the
14 Motion, I have caused to be mailed to Trojan's counsel, Rafael R. Garcia-Salgado, the original
15 Note and Deed of Trust for the Debtor's loan, together with assignments thereon.

16 4. The original Note has as of this writing been provided to our counsel of record to
17 produce to the Court at the May 25, 2018 continued hearing on the Motion.

18
19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct. Executed this 24th day of May, 2018, at Newport Beach,
21 California.

22
23 
24 _____
25 THANH VO
26
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1851 East First Street, Suite 1550, Santa Ana, California 92705-4067

A true and correct copy of the foregoing document entitled (*specify*):

SUPPLEMENTAL DECLARATION OF THANH VO IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) **05/24/18**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Brian C Andrews** elizabeth@briancandrews.com, andrewslawgroupinc@gmail.com;r44711@notify.bestcase.com
- **Thomas H Casey (TR)** msilva@tomcaseylaw.com, thc@trustesolutions.net
- **Rafael R Garcia-Salgado** rgarcia@bwsllaw.com, bantle@bwsllaw.com,rjr-nef@bwsllaw.com,jgomez@bwsllaw.com
- **Richard J Reynolds** rreynolds@bwsllaw.com, psoeffner@bwsllaw.com,tmims@bwsllaw.com,rjr-nef@bwsllaw.com;fcabezas@bwsllaw.com
- **Andrew A Smits** asmits@smits-law.com, kimberly@smits-law.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Gilbert R Yabes** ecfcacb@aldridgepите.com, GRY@ecf.inforuptcy.com;gyabes@aldridgepите.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) **05/24/18**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor: Michael Joseph Ruffner, 4829 Camino Costado, San Clemente, CA 92673

Judge: Honorable Erithe A. Smith, 411 West Fourth Street, Suite 5040, Santa Ana, CA 92701-4593

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE
TRANSMISSION OR EMAIL** (state method for each person or entity served):

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued
on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/24/18

Johnnelle Gomez

/s/ Johnnelle Gomez

Date

Printed Name

Signature